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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LA ALLIANCE FOR HUMAN RIGHTS,
et al.,

Plaintiffs,

vs.

CITY OF LOS ANGELES, a Municipal
entity, et al.,

Defendants.

Case No. CV 20-02291 DOC (KES)

**JOINT STIPULATION OF CITY OF
LOS ANGELES AND COUNTY OF
LOS ANGELES TO EXTEND
DEADLINE TO FILE STATUS
REPORT**

JOINT STIPULATION TO EXTEND DEADLINE TO FILE STATUS REPORT
Case No. CV 20-02291 DOC (KES)

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TO THE COURT, ALL PARTIES, AND ATTORNEYS OF RECORD:

Defendants City of Los Angeles and County of Angeles (collectively, “Defendants”), by and through their respective counsel, hereby stipulate to the following:

RECITALS

WHEREAS, on May 22, 2020, this Court issued a preliminary injunction, that requires Defendants to offer shelter or housing alternatives to homeless residents living within 500 feet of freeway overpasses, underpasses, and ramps, and to humanely relocate such individuals by September 1, 2020 (“Order”) [Dkt. 123];

WHEREAS the Order required periodic status reports from the parties as to their progress, and directed that the first such report shall be filed with the Court no later than 12:00 noon on Friday, June 12, 2020;

WHEREAS, the Court requested that in this status report at minimum, Defendants detail a plan for establishing shelter and clearing overpasses, underpasses, and ramps by no later than September 1, 2020 [Dkt. 123];

WHEREAS the Defendants have been diligently developing their respective plans for establishing shelter and humanely relocating persons camping near overpasses, underpasses, and ramps by September 1, 2020;

WHEREAS, on May 28, 2020, Defendants filed their Joint Request of City of Los Angeles and County of Los Angeles for Order to Mediate (“Joint Request”) [Dkt. 124];

WHEREAS, on May 29, 2020, the Honorable David Carter issued an Order Appointing Mediator, which granted Defendants’ Joint Request, and appointed the Honorable André Birotte Jr. to serve as the mediator in this matter [Dkt. 125];

WHEREAS, on May 29, 2020, the Honorable André Birotte Jr. issued an Order Setting Briefing Schedule and Mediation for Defendants City of Los Angeles and County of Los Angeles Pursuant to Judge Carter’s Order Appointing Mediator (“Scheduling Order”) [Dkt. 127];

WHEREAS, the Scheduling Order initially set the mediation for June 4, 2020, but Defendants and the Mediator agreed to hold the mediation on Thursday, June 11, 2020 at

JOINT STIPULATION TO EXTEND DEADLINE TO FILE STATUS REPORT

1 10:00 a.m. at the County of Los Angeles' Hall of Administration located at 500 West
2 Temple St, Los Angeles, CA 90012;

3 WHEREAS, Defendants further agreed to continue to mediate (if necessary) on
4 Friday, June 12, 2020 at 10:00 a.m. at Los Angeles City Hall located at 200 North Spring
5 St, Los Angeles, CA 90012;

6 WHEREAS, Defendants are entering mediation in good faith with the intent to
7 resolve outstanding funding issues by and between them;

8 WHEREAS, any agreements reached by and between Defendants during the course
9 of mediation could ultimately impact the plan(s) presented to the Court in the status report
10 due on Friday, June 12, 2020 at noon; and

11 WHEREAS, the parties have met and conferred and agree they will need an
12 additional week to draft any plans and agreements discussed in mediation and therefore
13 seek a one week extension of time to submit the initial status report.

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STIPULATION

NOW THEREFORE, IT IS HEREBY STIPULATED that the current deadline to file an initial status report with the court on June 12, 2020 shall be extended one week to June 19, 2020.

IT IS SO STIPULATED.

DATED: June 10, 2020

MARY C. WICKHAM

/s/ Lauren Black

Lauren M. Black
Principal Deputy County Counsel
COUNTY OF LOS ANGELES

DATED: June 10, 2020

CITY OF LOS ANGELES

/s/ Scott Marcus

Scott Marcus
Senior Assistant City Attorney
CITY OF LOS ANGELES

Filer's Attestation: Pursuant to Local Rule 5-4.3.4(a)(2)(1), Byron J. McLain hereby attests that concurrence in the filing of this document and its contents was obtained from all signatories listed above.